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*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

*Plaintiff,*

v.

Yeong Wan Cho (a.k.a. Peter Cho); Abdul Gaffar; Sei Young Yun; Salvacion USA, Inc.; Salvacion International, LLC; Salvacion Co., Ltd.; Salvacion R&D Center; Biosure Global, Ltd.; Immobiliaria La Salvacion, R.D.; John and Jane Does 1 through 10 (gender neutral fictitious names); ABC Corporation 1 through 10 (fictitious names),

*Defendants.*

Civil Action No.: 2:23-cv-3709

**PLAINTIFF'S UNOPPOSED  
MOTION FOR EXTENSION  
OF TIME TO FILE  
RESPONSE TO  
CONSOLIDATED MOTION  
TO DISMISS**

Document Electronically Filed

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**NOW COMES** Plaintiff TRUTEK CORP., by and through its attorneys, with this Motion for Extension of Time to File Response to Defendants' Consolidated Motion to Dismiss, and hereby states the following:

1. Plaintiff filed their Complaint on July 11, 2023. (ECF 1).
2. At this time, Plaintiff has not yet served all Defendants with the Complaint and Summons as required. Plaintiff filed a Motion for Extension of Time to Serve All Defendants (ECF 43), which the Court granted on October 11, 2023. (ECF 45).
3. Counsel for Plaintiff seeks additional time to respond to Defendants' Consolidated Motion to Dismiss, submitted to Plaintiff on October 25, 2023. The current deadline for Plaintiff's response is November 8, 2023. Plaintiff respectfully requests an extension of 14 days to respond.
4. Plaintiff has not moved for or obtained similar extensions of time to respond to the subject motion.
5. Defendants' brief in support of their Consolidated Motion to Dismiss totals 48 pages, excluding tables and title page, in excess of the 40-page limit imposed by L.Civ.R. 7.2(b). Plaintiff respectfully requests that the Court allow Plaintiff to likewise submit a responsive brief totaling up to 48 pages, excluding tables and title page.
6. Counsel for Plaintiff has sought concurrence of this Motion from counsel for the Defendants who have Appearances on file. Defendants counsel have expressed they will not oppose this motion.

7. This request is not filed for the purpose of delay; no party will be prejudiced by the granting of this motion.

Plaintiff respectfully requests that the Court approve the foregoing Motion for Extension of Time to File Response to Defendants' Consolidated Motion to Dismiss.

Date: November 3, 2023

Respectfully Submitted,

/s/ Solomon Radner

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2023, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner

*Attorney for Plaintiffs*